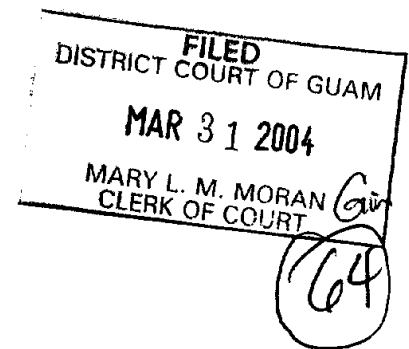


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	
)	
Plaintiffs,)	NOTICE OF EX PARTE
)	APPLICATION AND
v.)	EX PARTE APPLICATION
)	FOR ORDER STAYING
HONGKONG AND SHANGHAI)	ALL DEPOSITIONS
BANKING CORPORATION, LTD.,)	PENDING
et al.,)	DETERMINATION OF
Defendants.)	HSBC's MOTION TO DISMISS
_____)	

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on April _____, 2004, at the hour of ____
____m., Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC")
will bring the following Ex Parte Application before the Court.

Concurrently with this Ex Parte Application, HSBC has filed a Motion to Stay
All Depositions Pending Determination of HSBC's Motion to Dismiss ("Motion"). It
is important and urgent that the Motion be heard as soon as possible because HSBC's
Motion to Dismiss all causes of action in the Complaint was heard by the Court on

February 13, 2004, and was taken under advisement by the Court. As more fully described in the Motion, Plaintiffs are attempting to notice and conduct as many as ten (10) depositions, some of which will take place in foreign countries at great expense to the parties. In the event that this Court grants HSBC's Motion to Dismiss in its entirety, none of the depositions will be necessary. In the event the Court grants the Motion to Dismiss in part, the Court may simply dismiss certain causes of action from the Complaint or allow the Plaintiffs leave to file an amended complaint. Under either circumstance, the scope and nature of Plaintiffs' claim will be altered which may drastically effect the scope of discovery permissible in this case.

HSBC has requested that counsel for Plaintiffs stipulate to the entry of an Order staying all depositions pending a decision on the Motion to Dismiss but Plaintiffs have refused. The first scheduled depositions are set to commence in Guam on May 3, 2004, and it is anticipated that Plaintiffs will notice depositions for the latter part of April, 2004. Further, this Court has issued letters of request for depositions to be conducted in Hongkong on dates presently unknown. Accordingly, HSBC has no other alternative than to apply to this Court for ex parte relief.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.

Civil Case No. 03-00036

Notice of Ex Parte Application and Ex Parte Application for Order Staying All Depositions Pending
Determination of HSBC's Motion to Dismiss

Page 3 of 3 pages

by this reference. This Ex Parte Application is further supported by the Declaration of

Jacques G. Bronze concurrently filed herewith.

Dated this ³¹~~31~~ day of ^{Mar}~~April~~, 2004.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By: _____


JACQUES G. BRONZE